

Akin Gump
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MEMO ENDORSED

May 31, 2012

VIA FACSIMILE

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Room 620
500 Pearl Street
New York, NY 10017
(212) 805-7991 (facsimile)

Granted.
The June 19
conference is
adjourned to
July 25, 2012 at
12:00 pm.

Re: Request for Adjournment of Initial Pretrial Conference Scheduled for June 19, 2012
in *Loginovskaya v. Batratchenko, et al.*, No. 12 Civ. 336

Dear Judge Oetken:

The above-captioned matter in which we represent Plaintiff *Loginovskaya* is currently scheduled for an initial conference before Your Honor on June 19, 2012 at 3:00 p.m. We jointly request, together with counsel for Defendants Oleg Batratchenko, et al. (the "Thor Defendants") who is copied on this letter, an adjournment of that conference. This is the third request for an adjournment made by the parties in this matter. As Your Honor is aware, the Thor Defendants only recently engaged counsel to represent them in this action in May 2012. Moreover, the parties have recently stipulated that Plaintiff file a first amended complaint by June 13, and Defendants file their responsive pleading by July 5 [Docket # 21].

The parties seek to use a one to two week period after Defendants' responsive pleading has been filed on July 5 to coordinate and prepare accordingly for the initial conference. Counsel are presently available for all dates in July except for July 3, 5, 6, 9, 12, 13 (12:00 p.m. - 2:30 p.m.), 15, 16, 26, 30 and 31.

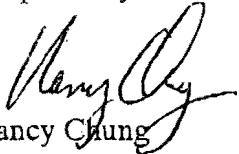
Finally, we wanted to bring to the Court's attention that although the parties' stipulation endorsed by the Court on May 30, 2012 [Docket # 21] has been docketed, the parties' prior stipulation dated May 14, which was emailed by the Thor Defendants' counsel to the orders and judgments clerk on May 15, has not yet been docketed on ECF. This May 14 stipulation remains relevant as it has been superseded only in regard to the filing deadlines reflected therein. A copy of the May 14 stipulation is enclosed as Exhibit A for re-submission to the Court.

SO ORDERED:
[Signature]
J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE 6/1/12

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Respectfully submitted,


Nancy Chung

cc: Judith Wallace, Counsel for Thor Defendants (via email)